

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

In Re:
SCOTT DAVID KOCH, JR.,
Debtor

ROCKET MORTGAGE, LLC, f/k/a QUICKEN
LOANS, LLC
Movant,

v.

SCOTT DAVID KOCH, JR.,
Respondent

JACK N ZAHAROPOULOS, Trustee

Chapter 13
CASE NO 1:22-bk-02498-HWV

ANSWER TO MOTION FOR RELIEF FROM AUTOMATIC STAY

AND NOW, comes the above-captioned Debtor, Scott David Koch, by and through his attorney, Dawn Cutaia, who files this Answer:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Denied. To the extent that Debtor has missed any payment, it can be cured through an amended plan.
7. Denied.
8. Denied.
9. Denied.
10. Denied.

WHEREFORE, Debtor respectfully requests this Honorable Court deny the Motion for Relief from Stay and allow Debtors to cure the arrears through an amended plan.

Respectfully Submitted

/s/ Dawn Marie Cutaia
Attorney for Debtors
Supreme Court ID: 77965
Fresh Start Law, PLLC
1701 W. Market Street
York PA 17404
717-304-1841
dmcutaia@gmail.com